

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PERINI/O&G, A JOINT VENTURE,

Plaintiff,

Case No. 12 Civ. 1931 (VB)

v.

USIMINAS MECÂNICA S.A. and  
USINAS SIDERÚRGICAS DE MINAS  
GERAIS S.A. – USIMINAS,

Defendants.

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**RESPONSE AND OBJECTIONS TO SUMMONS WITH NOTICE  
AND DEMAND FOR SERVICE OF A COMPLAINT**

Defendants, Usiminas Mecânica S.A. and Usinas Siderúrgicas de Minas Gerais S.A. –

Usiminas, hereby respond and object to the Summons with Notice dated May 11, 2011, as follows:

1. Defendants deny generally the allegations set forth in the Summons with Notice.
2. Defendants submit that the Summons with Notice is not a complaint or pleading that satisfies the requirements of Fed. R. Civ. P. 8(a). Defendants demand that plaintiff, Perini/O&G, A Joint Venture, file a complaint that satisfies such requirements within a reasonable period not exceeding 30 days following service of this pleading.
3. Defendants reserve their right to answer or move with respect to a proper complaint once it has been filed, and reserve all of their defenses in this action, including but not limited to defenses and objections as to venue, personal jurisdiction, and service of process.

*(Signature appears on next page.)*

Dated: April 4, 2012

Respectfully submitted,

**AKERMAN SENTERFITT LLP**

*s/ Martin Domb*

By: \_\_\_\_\_

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